

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
: Case No.: 20-11075-elf
Denise M. Hewitt :
: Chapter 13
Debtor :

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Denise M. Hewitt, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about February 21, 2020.
2. The Chapter 13 filing was assigned case number 20-11075.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about September 22, 2020.
4. On or about November 3, 2020 the Debtor and Nationstar Mortgage, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the Stipulation, the Debtor is delinquent in the sum of \$5,965.00 in post-petition payments. A true and correct copy of the Stipulation is attached hereto as **Exhibit “A.”**
6. The Debtor fell behind in her payments to the creditor due to unemployment as a result of COVID-19.
7. The Debtor has since returned to work and is prepared to make regular and timely payments.
8. In accordance with the Stipulation, the Debtor will cure the subject \$5,965.00 by amending the Chapter 13 plan.

9. In furtherance of the Stipulation and the Debtors curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

10. The Debtor's proposed modified Chapter 13 Plan, attached hereto as "**Exhibit B**", is affordable to the Debtor.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: November 5, 2020

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
Suite #502
Philadelphia, PA 19107